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CNC CHARLESTON
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DRAFT FINAL LETTER WORK PLAN FOR GROUNDWATER MONITORING AT BUILDING
1174 CNC CHARLESTON SC (DRAFT ACTING AS FINAL)
12/19/2013
RESOLUTION CONSULTANTS

December 19, 2013

VIA EMAIL

Ms. Meredith Amick
Corrective Action Section
Division of Waste Management
Bureau of Land and Waste Management
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, South Carolina 29201

Subject: Draft Final Letter Work Plan
Groundwater Monitoring at Building 1174
Charleston Naval Complex (CNC)
Contract Task Order Number JM29
Resolution Consultants Project No. 60273343

Dear Ms. Amick:

On behalf of the Department of the Navy, Naval Facilities Engineering Command Southeast (NAVFAC SE) and the Base Realignment and Closure Program Management Office, Southeast (BRAC PMO SE), Resolution Consultants is submitting this brief letter work plan for your review and approval to perform groundwater sampling at Building 1174 at the CNC. Site location and site detail maps are provided as Figure 1 and Figure 2, respectively.

The purpose of this investigation is to sample the groundwater at monitoring well 1174MW01 at Building 1174. During a visit to the site on September 13, 2013 by S&ME, Inc., a petroleum odor was noted when 1174MW01 was opened. South Carolina Department of Health and Environmental Control (SCDHEC) has requested the Navy sample the well due to the potential for changed conditions at the site.

Scope of Work

This site is regulated under the SCDHEC Resource Conservation and Recovery Act (RCRA) program. Resolution Consultants will sample the groundwater at monitoring well 1174MW01. Groundwater sampling activities will be performed in accordance with SCDHEC and Resolution Consultants Standard Operating Procedures (SOPs).

Under this CTO, one round of groundwater sampling will be conducted at monitoring well 1174MW01 in either December 2013 or January 2014. Groundwater samples will be collected in general accordance with the procedures outlined in Resolution Consultants SOP 3-14 (Attachment A). Prior to collecting groundwater samples, depth to groundwater will be



measured to the nearest 0.01 foot using an oil/water interface probe or equivalent. The water level will be recorded on a Resolution Consultants Water Level Measurement form.

Low-flow purging and sampling of the monitoring well will be performed using a peristaltic pump with Teflon®-lined polyethylene tubing. New Teflon®-lined polyethylene tubing will be used to eliminate the potential for cross-contamination. If the well is purged dry, the sample will be collected when the well has recharged to a sufficient volume.

Field measurements will be collected during sampling activities to include the amount of water purged, pH, temperature, conductivity, dissolved oxygen (DO), oxidation-reduction potential (ORP), turbidity, depth to water, and purge rate. All field data and sampling activities will be documented on appropriate forms.

Collected groundwater samples will be shipped to Gulf Coast Analytical Laboratories, Inc. (GCAL) located in Baton Rouge, Louisiana. GCALs SCDHEC Laboratory Certification number is 73006001. The samples will be analyzed for benzene, toluene, ethylbenzene, xylenes (BTEX), naphthalene, and methyl-tert-butyl ether (MTBE) by United States Environmental Protection Agency (USEPA) Method 8260B, polynuclear aromatic hydrocarbons (PAHs) by USEPA method 8270D Selective Ion Monitoring (SIM), and 1,2-dibromoethane (EDB) by USEPA Method 8011. One trip blank, one duplicate sample, and one matrix spike (MS)/matrix spike duplicate (MSD) sample will be analyzed for quality assurance/quality control. No equipment rinsate blanks or field blanks samples will be collected.

Liquid investigation-derived waste (IDW) generated during sampling will be handled in accordance with Resolution Consultants SOP 3-05 (Attachment A). Purge water and decontamination water, if generated, will be containerized in a 55-gallon drum. Data resulting from analyses performed on samples collected during this groundwater sampling event will be used for waste characterization. As a result, samples of containerized liquid IDW will not be collected for analysis. Liquid IDW will be shipped to a permitted waste disposal facility if necessary. Waste classified as personal protective equipment will be disposed as solid waste.

Deliverables

A report documenting the groundwater sampling activities will be submitted to SCDHEC. The report will include the following information:

- A. A brief description of the work.
- B. A table summarizing the laboratory analytical results.
- C. A figure indicating the well location and results.

Groundwater results will be compared to the USEPA Maximum Contaminant Levels (MCLs) (USEPA, November 2013). If no EPA MCL is available, then the groundwater results will be compared to the USEPA Tapwater Regional Screening Levels (RSLs) dated November 2013 (USEPA, November 2013). Appropriate field forms will be included as appendices. A Draft version of these documents will be submitted to the Navy for review and approval. Resolution Consultants will address Navy comments and revise the Draft documents, prior to submitting

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the Draft Final versions to SCDHEC for comment. SCDHEC comments will be incorporated into the Final versions of the documents and will be distributed to the Navy, SCDHEC, and S&ME/CLEMSON.

If you have any questions or comments regarding the information provided in this letter, please contact me at (843) 740-7356 or by email at Shawn.Dolan@aecom.com. Thank you for your consideration and cooperation regarding this matter.

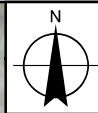
Sincerely,



Shawn Dolan, P.G.
Project Manager
Resolution Consultants

cc: Art Sanford, Navy BRAC PMO SE
David Criswell, Navy BRAC PMO SE
Resolution Consultants, file

Figures



Building 1174

0 200 400 600 800
Feet

FIGURE 1
SITE LOCATION MAP
BUILDING 1174
CHARLESTON NAVAL COMPLEX
CHARLESTON, SC



REQUESTED BY: SED

DATE: 12/5/2013

DRAWN BY: CSB

TASK ORDER NUMBER: JM29

Basemap Source: Esri World Imagery
http://services.arcgis.com/arcgis/services/World_Imagery
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Legend



Building 1174



Monitoring Well

Basemap Source: Esri World Imagery
http://services.arcgis.com/arcgis/services/World_Imagery

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0 50 100 150 200

Feet

FIGURE 2
 SITE MAP
 BUILDING 1174
 CHARLESTON NAVAL COMPLEX
 CHARLESTON, SC



REQUESTED BY: SED

DATE 12/5/2013

DRAWN BY: CSB

TASK ORDER NUMBER: JM 29

Attachment A

Resolution Consultants SOPs

Monitoring Well Sampling

Procedure 3-14

1.0 Purpose and Scope

- 1.1 This standard operating procedure (SOP) describes the actions to be used during monitoring well sampling activities and establishes the method for sampling groundwater monitoring wells for water-borne contaminants and general groundwater chemistry. The objective is to obtain groundwater samples that are representative of aquifer conditions with as little alteration to water chemistry as possible.
- 1.2 This procedure is the Program-approved professional guidance for work performed by Resolution Consultants under the Comprehensive Long-Term Environmental Action Navy (CLEAN) contract (Contract Number N62470-11-D-8013).
- 1.3 As guidance for specific activities, this procedure does not obviate the need for professional judgment. Deviations from this procedure while planning or executing planned activities must be approved in accordance with Program requirements for technical planning and review.

2.0 Safety

- 2.1 Depending upon the site-specific contaminants, various protective programs must be implemented prior to sampling the first well. All field sampling personnel responsible for sampling activities must review the project-specific health and safety plan (HASP) paying particular attention to the control measures planned for the well sampling tasks. Conduct preliminary area monitoring of sampling wells to determine the potential hazard to field sampling personnel. If significant contamination is observed, minimize contact with potential contaminants in both the vapor phase and liquid matrix through the use of appropriate personal protective equipment (PPE).
- 2.2 Observe standard health and safety practices according to the project-specific HASP. Suggested minimum protection during well sampling activities includes inner disposable vinyl gloves, outer chemical-protective nitrile gloves and rubberized steel-toed boots. Half-face respirators and cartridges and Tyvek® suits may be necessary depending on the contaminant concentrations. Refer to the project-specific HASP for the required PPE.
- 2.3 Physical Hazards associated with Well Sampling
 - To avoid lifting injuries associated with pump and bailers retrieval, use the large muscles of the legs, not the back.
 - Stay clear of all moving equipment, and avoid wearing loose fitting clothing.
 - When using tools for cutting purposes, cut away from yourself. The use of appropriate, task specific cutting tools is recommended.
 - To avoid slip/trip/fall conditions as a result of pump discharge, use textured boots/boot cover bottoms.
 - To avoid heat/cold stress as a result of exposure to extreme temperatures and PPE, drink electrolyte replacement fluids (1 to 2 cups per hour is recommended) and, in cases of extreme cold, wear fitted insulating clothing.
 - Be aware of restricted mobility due to PPE.

3.0 Terms and Definitions

None.

4.0 Interferences

4.1 Potential interferences could result from cross-contamination between samples or sample locations. Minimization of the cross-contamination will occur through the following:

- The use of clean sampling tools at each location as necessary.
- Avoidance of material that is not representative of the media to be sampled.

5.0 Training and Qualifications

5.1 Qualifications and Training

The individual executing these procedures must have read, and be familiar with, the requirements of this SOP.

5.2 Responsibilities

5.2.1 The **Contract Task Order (CTO) Manager** is responsible for ensuring that monitoring well sampling activities comply with this procedure. The **CTO Manager** is responsible for ensuring that all field sampling personnel involved in monitoring well sampling shall have the appropriate education, experience, and training to perform their assigned tasks.

5.2.2 The **Program Quality Manager** is responsible for ensuring overall compliance with this procedure.

5.2.3 The **Field Manager** is responsible for ensuring that all field sampling personnel follow these procedures.

5.2.4 **Field sampling personnel** are responsible for the implementation of this procedure.

5.2.5 The field sampler and/or task manager is responsible for directly supervising the groundwater sampling procedures to ensure that they are conducted according to this procedure and for recording all pertinent data collected during sampling.

6.0 Equipment and Supplies

6.1 Purging and Sampling Equipment

- Pump (Peristaltic, Portable Bladder, Submersible)
- Polyethylene or Teflon bladders (for portable bladder pumps)
- Bladder pump controller (for portable bladder pumps)
- Air compressor (for portable bladder pumps)
- Nitrogen cylinders (for portable bladder pumps)
- 12-volt power source
- Polyethylene inlet and discharge tubing (except for VOC analysis which requires Teflon tubing)
- Silicone tubing appropriate for peristaltic pump head
- Teflon bailer appropriately sized for well

- Disposable bailer string (polypropylene)
- Individual or multi-parameter water quality meter(s) with flow-through cell to measure temperature, pH, specific conductance, dissolved oxygen (DO), oxidation reduction potential (ORP), and/or turbidity
- Turbidity meter
- Water level meter
- Oil/water interface probe

6.2 General Equipment

- Sample kit (i.e., bottles, labels, preservatives, custody records and tape, cooler, ice)
- Sample Chain-of-Custody (COC) forms
- Sample Collection Records
- Sample packaging and shipping supplies
- Waterproof marker or paint
- Distilled/deionized water supply
- Water dispenser bottles
- Flow measurement cup or bucket
- 5-gallon buckets
- Instrument calibration solutions
- Stopwatch or watch
- Disposable Nitrile gloves
- Paper towels
- Trash bags
- Zipper-lock bags
- Equipment decontamination supplies
- Health and safety supplies (as required by the HASP)
- Approved plans such as: project-specific HASP and Sampling and Analysis Plan (SAP)
- Well keys or combinations
- Monitoring well location map(s)
- Field project logbook/pen

7.0 Calibration or Standardization

- 7.1 Field instruments will be calibrated daily according to the requirements of the SAP and manufacturer's specifications for each piece of equipment. Equipment will be checked daily with the calibration solutions at the end of use of the equipment. Calibration records shall be recorded in the field logbook or appropriate field form.
- 7.2 If readings are suspected to be inaccurate, the equipment shall be checked with the calibration solutions and/or re-calibrated.

8.0 Procedure

8.1 Preparation

8.1.1 Site Background Information

Establish a thorough understanding of the purposes of the sampling event prior to field activities. Conduct a review of all available data obtained from the site and pertinent to the water sampling. Review well history data including, but not limited to, well locations, sampling history, purging rates, turbidity problems, previously used purging methods, well installation methods, well completion records, well development methods, previous analytical results, presence of an immiscible phase, historical water levels, and general hydrogeologic conditions.

Previous groundwater development and sampling logs give a good indication of well purging rates and the types of problems that might be encountered during sampling, such as excessive turbidity and low well yield. They may also indicate where dedicated pumps are placed in the water column. To help minimize the potential for cross-contamination, well purging and sampling and water level measurement collection shall proceed from the least contaminated to the most contaminated well as indicated by previous analytical results. This order may be changed in the field if conditions warrant it, particularly if dedicated sampling equipment is used. A review of prior sampling procedures and results may also identify which purging and sampling techniques are appropriate for the parameters to be tested under a given set of field conditions.

8.1.2 Groundwater Analysis Selection

Establish the requisite field and laboratory analyses prior to water sampling. Decide on the types and numbers of quality assurance/quality control (QA/QC) samples to be collected (refer to the project-specific SAP), as well as the type and volume of sample preservatives, the type and number of sample containers, the number of coolers required, and the quantity of ice or other chilling materials. The field sampling personnel shall ensure that the appropriate number and size sample containers are brought to the site, including extras in case of breakage or unexpected field conditions. Refer to the project-specific SAP for the project analytical requirements.

8.2 Groundwater Sampling Procedures

Groundwater sampling procedures at a site shall include:

- 1) An evaluation of the well security and condition prior to sampling;
- 2) Decontamination of equipment;
- 3) Measurement of well depth to groundwater;
- 4) Assessment of the presence or absence of an immiscible phase;
- 5) Assessment of purge parameter stabilization;
- 6) Purging of static water within the well and well bore; and
- 7) Obtaining a groundwater sample.

Each step is discussed in sequence below. Depending upon specific field conditions, additional steps may be necessary. As a rule, at least 24 hours should separate well development and well sampling events. In all cases, consult the State and local regulations for the site, which may require more stringent time separation between well development and sampling.

8.2.1 Well Security and Condition

At each monitoring well location, observe the conditions of the well and surrounding area. The following information may be noted on a Groundwater Sample Collection Record (Attachment 1) or in the field logbook:

- Condition of the well's identification marker.
- Condition of the well lock and associated locking cap.
- Integrity of the well – well pad condition, protective outer casing, obstructions or kinks in the well casing, presence of water in the annular space, and the top of the interior casing.
- Condition of the general area surrounding the well.

8.2.2 Decontamination of Equipment

Where possible, dedicated supplies should be used at each well location to minimize the potential for cross-contamination and minimize the amount of investigation derived waste (IDW) fluids resulting from the decontamination process. If decontamination is necessary, establish a decontamination station before beginning sampling. The station shall consist of an area of at least 4 feet by 2 feet covered with plastic sheeting and be located upwind of the well being sampled. The station shall be large enough to fit the appropriate number of wash and rinse buckets, and have sufficient room to place equipment after decontamination. One central cleaning area may be used throughout the entire sampling event. The area around the well being sampled shall also be covered with plastic sheeting to prevent spillage. Further details are presented in SOP 3-06, Equipment Decontamination.

Decontaminate each piece of equipment prior to entering the well. Also, conduct decontamination prior to sampling at a site, even if the equipment has been decontaminated subsequent to its last usage. Additionally, decontaminate each piece of equipment used at the site prior to leaving the site. It is only necessary to decontaminate dedicated sampling equipment prior to installation within the well. Do not place clean sampling equipment directly on the ground or other contaminated surfaces prior to insertion into the well. Dedicated sampling equipment that has been certified by the manufacturer as being decontaminated can be placed in the well without on-site decontamination.

8.2.3 Measurement of Static Water Level Elevation

Before purging the well, measure water levels in all of the wells within the zone of influence of the well being purged. The best practice, if possible, is to measure all site wells (or wells within the monitoring well network) prior to sampling. If the well cap is not vented, remove the cap several minutes before measurement to allow water levels to equilibrate to atmospheric pressure.

Measure the depth to standing water and the total depth of the well to the nearest 0.01 foot to provide baseline hydrologic data, to calculate the volume of water in the well, and to provide information on the integrity of the well (e.g., identification of siltation problems). If not already present, mark an easily identified reference point for water level measurements which will become the measuring point for all water level measurements. This location and elevation must be surveyed.

The device used to measure the water level surface and depth of the well shall be sufficiently sensitive and accurate in order to obtain a measurement to the nearest 0.01 foot reliably. An electronic water level meter will usually be appropriate for this measurement; however, when the groundwater within a particular well is highly contaminated, an inexpensive weighted tape measure can be used to determine well depth to prevent adsorption of contaminants onto the meter tape. The presence of light, non-aqueous phase liquids (LNAPLs) and/or dense, non-aqueous phase liquids (DNAPLs) in a well requires measurement of the elevation of the top and the bottom of the product, generally using an interface probe. Water levels in such wells must then be corrected for density effects to accurately determine the elevation of the water table.

At each location, measure water levels several times in quick succession to ensure that the well has equilibrated to atmospheric conditions prior to recording the measurement. As stated above, measure all site wells (or wells within the monitoring well network) prior to sampling whenever possible. This will provide a water level database that describes water levels across the site at one time (a synoptic sampling). Prior to sampling, measure the water level in each well immediately prior to purging the well to ascertain that static conditions have been achieved prior to sampling.

8.2.4 Detection of Immiscible Phase Layers

Complete the following steps for detecting the presence of LNAPL and DNAPL before the well is purged for conventional sampling. These procedures may not be required for all wells. Consult the project-specific SAP to determine if assessing the presence of LNAPL and/or DNAPL is necessary.

- 1) Sample the headspace in the wellhead immediately after the well is opened for organic vapors using either a PID or an organic vapor analyzer, and record the measurements.
- 2) Lower an interface probe into the well to determine the existence of any immiscible layer(s), LNAPL and/or DNAPL, and record the measurements.
- 3) Confirm the presence or absence of an immiscible phase by slowly lowering a clear bailer to the appropriate depth, then visually observing the results after sample recovery.
- 4) In rare instances, such as when very viscous product is present, it may be necessary to utilize hydrocarbon- and water-sensitive pastes for measurement of LNAPL thickness. This is accomplished by smearing adjacent, thin layers of both hydrocarbon- and water-sensitive pastes along a steel measuring tape and inserting the tape into the well. An engineering tape showing tenths and hundredths of feet is required. Record depth to water, as shown by the mark on the water-sensitive paste, and depth to product, as shown by the mark on the product-sensitive paste. In wells where the approximate depth to water and product thickness are not known, it is best to apply both pastes to the tape over a fairly long interval (5 feet or more). Under these conditions, measurements are obtained by trial and error and may require several insertions and retrievals of the tape before the paste-covered interval of the tape encounters product and water. In wells where approximate depths of air-product and product-water interfaces are known, pastes may be applied over shorter intervals. Water depth measurements should not be used in preparation of water table contour maps until they are corrected for depression by the product.
- 5) If the well contains an immiscible phase, it may be desirable to sample this phase separately. Section 8.2.6 presents immiscible phase sampling procedures. It may not be meaningful to conduct water sample analysis of water obtained from a well containing LNAPLs or DNAPLs. Consult the **CTO Manager** and **Program Quality Manager** if this situation is encountered.

8.2.5 Purging Equipment and Use

General Requirements

The water present in a well prior to sampling may not be representative of in situ groundwater quality and shall be removed prior to sampling. Handle all groundwater removed from potentially contaminated wells in accordance with the IDW handling procedures in SOP 3-05, IDW Management. Purging shall be accomplished by methods as indicated in the project-specific SAP or by those required by State requirements. For the purposes of this SOP, purging methods will be described by removing groundwater from the well using low-flow techniques.

According to the U.S. Environmental Protection Agency (EPA) (EPA, 1996), the rate at which groundwater is removed from the well during purging ideally should be less than 0.2 to 0.3 liters/minute. EPA further states that wells should be purged at rates below those used to develop the well to prevent further development of the well, to prevent damage to the well, and to avoid disturbing accumulated

corrosion or reaction products in the well. EPA also indicates that wells should be purged at or below their recovery rate so that migration of water in the formation above the well screen does not occur.

Realistically, the purge rate should be low enough that substantial drawdown in the well does not occur during purging. In addition, a low purge rate will reduce the possibility of stripping volatile organic compounds (VOCs) from the water, and will reduce the likelihood of increasing the turbidity of the sample due to mobilizing colloids in the subsurface that are immobile under natural flow conditions.

The field sampler shall ensure that purging does not cause formation water to cascade down the sides of the well screen. Wells should not be purged to dryness if recharge causes the formation water to cascade down the sides of the screen, as this will cause an accelerated loss of volatiles. This problem should be anticipated based on the results of either the well development task or historical sampling events. In general, place the intake of the purge pump in the middle of the saturated screened interval within the well to allow purging and at the same time minimize disturbance/overdevelopment of the screened interval in the well. Water shall be purged from the well at a rate that does not cause recharge water to be excessively agitated unless an extremely slow recharging well is encountered where complete evacuation is unavoidable. During the well purging procedure, collect water level and/or product level measurements to assess the hydraulic effects of purging. Sample the well when it recovers sufficiently to provide enough water for the analytical parameters specified. If the well is purged dry, allow the well to recover sufficiently to provide enough water for the specified analytical parameters, and then sample it.

Evaluate water samples on a regular basis during well purging and analyze them in the field preferably using in-line devices (i.e., flow through cell) for temperature, pH, specific conductivity, dissolved oxygen (DO), and oxidation-reduction (redox) potential. Turbidity should be measured separately (outside of the flow-through cell) with a nephelometer or similar device.

Readings should be taken every 2 to 5 minutes during the purging process. These parameters are measured to demonstrate that the natural character of the formation waters has been restored.

Purging shall be considered complete per the requirements set forth in the project-specific SAP, State requirements, or when three consecutive field parameter measurements of temperature, pH, specific conductivity, DO and ORP stabilize within approximately 10 percent and the turbidity is at or below 10 nephelometric turbidity units (NTU) or within $\pm 10\%$ if above 10 NTU. This criterion may not be applicable to temperature if a submersible pump is used during purging due to the heating of the water by the pump motor. Enter all information obtained during the purging and sampling process into a groundwater sampling log. Attachment 1 shows an example of a groundwater sampling log and the information typically included in the form. Whatever form is used, all blanks need to be completed on the field log during field sampling.

Groundwater removed during purging shall be stored according to the project-specific SAP or per SOP 3-05, IDW Management.

Purging Equipment and Methods

Submersible Pump

A stainless steel submersible pump may be utilized for purging both shallow and deep wells prior to sampling the groundwater for semivolatile and non-volatile constituents, but are generally not preferred for VOCs unless there are no other options (e.g., well over 200 feet deep). For wells over 200 feet deep, the submersible pump is one of the few technologies available to feasibly accomplish purging under any yield conditions. For shallow wells with low yields, submersible pumps are generally inappropriate due to overpumpage of the wells (<1 gallon per minute), which causes increased aeration of the water within the well.

Steam clean or otherwise decontaminate the pump and discharge tubing prior to placing the pump in the well. The submersible pump shall be equipped with an anti-backflow check valve to limit the amount of

water that will flow back down the drop pipe into the well. Place the pump in the middle of the saturated screened interval within the well and maintain it in that position during purging.

Bladder Pump

A stainless steel bladder pump can be utilized for purging and sampling wells up to 200 feet in depth for volatile, semivolatile, and non-volatile constituents. Use of the bladder pump is most effective in low to moderate yield wells and are often the preferred method for low-flow sampling. When sampling for VOCs and/or SVOCs, Teflon bladders should be used. Polyethylene bladders may be used when sampling for inorganics.

Either compressed dry nitrogen or compressed dry air, depending upon availability, can operate the bladder pump. The driving gas utilized must be dry to avoid damage to the bladder pump control box. Decontaminate the bladder pump prior to use.

Centrifugal, Peristaltic, or Diaphragm Pump

A centrifugal, peristaltic, or diaphragm pump may be utilized to purge a well if the water level is within 20 feet of ground surface. New or dedicated tubing is inserted into the midpoint of the saturated screened interval of the well. Water should be purged at a rate that satisfies low-flow requirements (i.e., does not cause drawdown). Centrifugal, peristaltic, or diaphragm pump are generally discouraged for VOCs sampling; however, follow methods allowed per the project-specific SAP or State requirements.

Air Lift Pump

Airlift pumps are not appropriate for purging or sampling.

Bailer

Avoid using a bailer to purge a well because it can result in overdevelopment of the well and create excessive purge rates. If a bailer must be used, the bailer should either be dedicated or disposable. Teflon-coated cable mounted on a reel is recommended for lowering the bailer in and out of the well.

Lower the bailer below the water level of the well with as little disturbance of the water as possible to minimize aeration of the water in the well. One way to gauge the depth of water on the reel is to mark the depth to water on the bailer wire with a stainless steel clip. In this manner, less time is spent trying to identify the water level in the well.

8.2.6 Monitoring Well Sampling Methodologies

Sampling Light, Non-Aqueous Phase Liquids (LNAPL)

Collect LNAPL, if present, prior to any purging activities. The sampling device shall generally consist of a dedicated or disposable bailer equipped with a bottom-discharging device. Lower the bailer slowly until contact is made with the surface of the LNAPL, and to a depth less than that of the immiscible fluid/water interface depth as determined by measurement with the interface probe. Allow the bailer to fill with LNAPL and retrieve it.

When sampling LNAPLs, never drop bailers into a well and always remove them from the well in a manner that causes as little agitation of the sample as possible. For example, the bailer should not be removed in a jerky fashion or be allowed to continually bang against the well casing as it is raised. Teflon bailers should always be used when sampling LNAPL. The cable used to raise and lower the bailer shall be composed of an inert material (e.g., stainless steel) or coated with an inert material (e.g., Teflon).

Sampling Dense, Non-Aqueous Phase Liquids (DNAPL)

Collect DNAPL prior to any purging activities. The best method for collecting DNAPL is to use a double-check valve, stainless steel bailer, or a Kemmerer (discrete interval) sampler. The sample shall be collected by slow, controlled lowering of the bailer to the bottom of the well, activation of the closing device, and retrieval.

Groundwater Sampling Methodology

The well shall be sampled when groundwater within it is representative of aquifer conditions per the methods described in Section 8.2.5. Prior to sampling the flow-through cell shall be removed and the samples collected directly from the purge tubing. Flow rates shall not be adjusted once aquifer conditions are met. Additionally, a period of no more than 2 hours shall elapse between purging and sampling to prevent groundwater interaction with the casing and atmosphere. This may not be possible with a slowly recharging well. Measure and record the water level prior to sampling in order to monitor drawdown when using low-flow techniques and gauge well volumes removed and recharged when using non-low-flow techniques.

Sampling equipment (e.g., especially bailers) shall never be dropped into the well, as this could cause aeration of the water upon impact. Additionally, the sampling methodology utilized shall allow for the collection of a groundwater sample in as undisturbed a condition as possible, minimizing the potential for volatilization or aeration. This includes minimizing agitation and aeration during transfer to sample containers, minimizing exposure to sunlight, and immediately placing the sample on ice once collected.

Sampling equipment shall be constructed of inert material. Equipment with neoprene fittings, polyvinyl chloride (PVC) bailers, Tygon® tubing, silicon rubber bladders, neoprene impellers, polyethylene, and Viton® are not acceptable when sampling for organics. If bailers are used, an inert cable/chain (e.g., fluorocarbon resin-coated wire or stainless steel wire or cable) shall be used to raise and lower the bailer. Dedicated equipment is highly recommended for all sampling programs.

Submersible Pumps

The submersible pump must be specifically designed for groundwater sampling (i.e., pump composed of stainless steel and Teflon, sample discharge lines composed of Teflon) and must have a controller mechanism allowing the required low-flow rate. Adjust the pump rate so that flow is continuous and does not pulsate to avoid aeration and agitation within the sample discharge lines. Run the pump for several minutes at the low-flow rate used for sampling to ensure that the groundwater in the lines was obtained at the low-flow rate.

Bladder Pumps

A gas-operated stainless steel bladder pump with adjustable flow control and equipped with a Teflon bladder and Teflon-lined tubing can be effectively utilized to collect a groundwater sample and is considered to be the best overall device for sampling inorganic and organic constituents. If only inorganics are being sampled, polyvinyl bladders and tubing may be used. Operate positive gas displacement bladder pumps in a continuous manner so that they minimize discharge pulsation that can aerate samples in the return tube or upon discharge.

When using a compressor, take several precautions. If the compressor is being powered by a gasoline generator, position the generator downwind of the well. Ground fault circuit interrupters (GFCIs) should always be used when using electric powered equipment. Do not connect the compression hose from the compressor to the pump controller until after the engine has been started.

When all precautions are completed and the compressor has been started, connect the compression hose to the pump controller. Slowly adjust the control knobs to discharge water in the shortest amount of time while maintaining a near constant flow. This does not mean that the compressor must be set to discharge the water as hard as possible. The optimal setting is one that produces the largest volume of purge water per minute (not per purge cycle) while maintaining a near constant flow rate.

Prior to sampling, adjust the flow rate (purge rate) to yield 100 to 300 mL/minute. Avoid settings that produce pulsating streams of water instead of a steady stream if possible. Operate the pump at this low flow rate for several minutes to ensure that drawdown is not occurring. At no time shall the sample flow rate exceed the flow rate used while purging.

For those samples requiring filtration, it is recommended to use an in-line high capacity filter after all non-filtered samples have been collected.

Peristaltic Pumps:

A peristaltic pump is a type of positive displacement pump that moves water via the process of peristalsis. The pump uses a flexible hose fitted inside a circular pump casing. A rotor with cams compresses the flexible tube as the rotor turns, which forces the water to be pumped to move through the tube. In peristaltic pumps, no moving parts of the pump are in contact with the water being pumped. Displacement is determined by tube size, so delivery rate can only be changed during operation by varying pump speed. Peristaltic pumps are simple and quite inexpensive for the flow rates they provide.

There are several methods available for transferring the sample into the laboratory containers. The selected method may vary based on State requirements and should be documented in the project-specific SAP. Samples typically can be collected directly from the discharge end of the Teflon tubing, after it has been disconnected from the flow through cell. For volatile analyses, the sampler should make sure that the pump is set such that a smooth laminar flow is achieved. In all cases, the project team should consult their local regulatory requirements and document the selected sample collection procedure in the project-specific SAP.

Bailers

A single- or double-check valve Teflon or stainless steel bailer equipped with a bottom discharging device can be utilized to collect groundwater samples. Bailers have a number of disadvantages, however, including a tendency to alter the chemistry of groundwater samples due to degassing, volatilization, and aeration; the possibility of creating high groundwater entrance velocities; differences in operator techniques resulting in variable samples; and difficulty in determining where in the water column the sample was collected. Therefore, use bailers for groundwater sampling only when other types of sampling devices cannot be utilized for technical, regulatory, or logistical reasons.

Dedicated or disposable bailers should always be used in order to eliminate the need for decontamination and to limit the potential of cross-contamination. Each time the bailer is lowered to the water table, lower it in such a way as to minimize disturbance and aeration of the water column within the well.

8.2.7 Sample Handling and Preservation

Many of the chemical constituents and physiochemical parameters to be measured or evaluated during groundwater monitoring programs are chemically unstable and require preservation. The U.S. EPA document entitled, *Test Methods for Evaluating Solid Waste – Physical/Chemical Methods (SW-846)* (EPA 1997), includes a discussion of appropriate sample preservation procedures. In addition, SW-846 provides guidance on the types of sample containers to use for each constituent or common set of parameters. In general, check with specific laboratory or State requirements prior to obtaining field samples. In many cases, the laboratory will supply the necessary sample bottles and required preservatives. In some cases, the field sampling personnel may add preservatives in the field.

Improper sample handling may alter the analytical results of the sample. Therefore, transfer samples in the field from the sampling equipment directly into the container that has been prepared specifically for that analysis or set of compatible parameters as described in the project-specific SAP. It is not an acceptable practice for samples to be composited in a common container in the field and then split in the laboratory, or poured first into a wide mouth container and then transferred into smaller containers.

Collect groundwater samples and place them in their proper containers in the order of decreasing volatility and increasing stability. A preferred collection order for some common groundwater parameters is:

1. VOCs and total organic halogens (TOX)

2. Dissolved gases, total organic carbon (TOC), total fuel hydrocarbons
3. Semivolatile organics, pesticides
4. Total metals, general minerals (unfiltered)
5. Dissolved metals, general minerals (filtered)
6. Phenols
7. Cyanide
8. Sulfate and chloride
9. Nitrate and ammonia
10. Radionuclides

When sampling for VOCs, collect water samples in vials or containers specifically designed to prevent loss of VOCs from the sample. The analytical laboratory performing the analysis shall provide these vials. Collect groundwater from the sampling device in vials by allowing the groundwater to slowly flow along the sides of the vial. Sampling equipment shall not touch the interior of the vial. Fill the vial above the top of the vial to form a positive meniscus with no overflow. No headspace shall be present in the sample container once the container has been capped. This can be checked by inverting the bottle once the sample is collected and tapping the side of the vial to dislodge air bubbles. Sometimes it is not possible to collect a sample without air bubbles, particularly water that has high concentrations of dissolved gasses. In these cases, the field sampling personnel shall document the occurrence in the field logbook and/or sampling worksheet at the time the sample was collected. Likewise, the analytical laboratory shall note in the laboratory analysis reports any headspace in the sample container(s) at the time of receipt by the laboratory.

Special Handling Considerations

In general, samples for organic analyses should not be filtered. However, high turbidity samples for PCB analysis may require filtering. Consult the project-specific SAP for details on filtering requirements. Samples shall not be transferred from one container to another because this could cause aeration or a loss of organic material onto the walls of the container. TOX and TOC samples should be handled in the same manner as VOC samples.

When collecting total and dissolved metals samples, the samples should be collected sequentially. The total metals sample is collected from the pump unfiltered. The dissolved metals sample is collected after filtering with a 0.45-micron membrane in-line filter. Allow at least 500 mL of effluent to flow through the filter prior to sampling to ensure that the filter is thoroughly wetted and seated in the filter capsule. If required by the project-specific SAP, include a filter blank for each lot of filters used and always record the lot number of the filters.

Field Sampling Preservation

Preserve samples immediately upon collection. Ideally, sampling containers will be pre-preserved with a known concentration and volume of preservative. Certain matrices that have alkaline pH (greater than 7) may require more preservative than is typically required. An early assessment of preservation techniques, such as the use of pH strips after initial preservation, may therefore be appropriate. Guidance for the preservation of environmental samples can be found in the U.S. EPA *Handbook for Sampling and Sample Preservation of Water and Wastewater* (EPA 1982). Additional guidance can be found in other U.S. EPA documents (EPA 1992, 1996).

Field Sampling Log

A groundwater sampling log provided as Attachment 1 shall document the following:

- Identification of well

- Well depth
- Static water level depth and measurement technique
- Presence of immiscible layers and detection method
- Well yield
- Purge volume and pumping rate
- Time that the well was purged
- Sample identification numbers
- Well evacuation procedure/equipment
- Sample withdrawal procedure/equipment
- Date and time of collection
- Types of sample containers used
- Preservative(s) used
- Parameters requested for analysis
- Field analysis data
- Field observations on sampling event
- Name of sampler
- Weather conditions

9.0 Quality Control and Assurance

- 9.1 Field personnel will follow specific quality assurance (QA) guidelines as outlined in the project-specific SAP. The goal of the QA program should be to ensure precision, accuracy, representativeness, completeness, and comparability in the project sampling program.
- 9.2 Quality control (QC) requirements for sample collection are dependent on project-specific sampling objectives. The project-specific SAP will provide requirements for sample preservation and holding times, container types, sample packaging and shipment, as well as requirements for the collection of various QC samples such as trip blanks, field blanks, equipment rinse blanks, and field duplicate samples.

10.0 Data and records management

- 10.1 Records will be maintained in accordance with SOP 3-03, Recordkeeping, Sample Labelling, and Chain-of-Custody. Various forms are required to ensure that adequate documentation is made of the sample collection activities. These forms may include:
- Sample Collection Records;
 - Field logbook;
 - Chain-of-custody forms; and
 - Shipping labels.

- 10.2 Sample collection records (Attachment 1) will provide descriptive information for the purging process and the samples collected at each monitoring well.
- 10.3 The field logbook is kept as a general log of activities and should not be used in place of the sample collection record.
- 10.4 Chain-of-custody forms are transmitted with the samples to the laboratory for sample tracking purposes.
- 10.5 Shipping labels are required is sample coolers are to be transported to a laboratory by a third party (courier service).

11.0 Attachments or References

Attachment 1 – Groundwater Sampling Collection Record

ASTM Standard D5088. 2008. *Standard Practice for Decontamination of Field Equipment Used at Waste Sites*. ASTM International, West Conshohocken, PA. 2008. DOI: 10.1520/D5088-02R08. www.astm.org.

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SOP 3-03, *Recordkeeping, Sample Labelling, and Chain-of-Custody*.

SOP 3-05, *IDW Management*.

SOP 3-06, *Equipment Decontamination*.

<i>Author</i>	<i>Reviewer</i>	<i>Revisions (Technical or Editorial)</i>
Mark Kromis Program Chemist	Chris Barr Program Quality Manager	Rev 0 – Initial Issue (May 2012)

Attachment 1 Groundwater Sample Collection Record



Well ID: _____

Groundwater Sample Collection Record

Client: _____ Date: _____ Time: Start _____ am/pm
Project No: _____ Finish _____ am/pm
Site Location: _____
Weather Conds: _____ Collector(s): _____

1. WATER LEVEL DATA: (measured from Top of Casing)

a. Total Well Length _____ c. Length of Water Column _____ (a-b) Casing Diameter/Material _____
b. Water Table Depth _____ d. Calculated Well Volume (see back) _____

2. WELL PURGEABLE DATA

a. Purge Method: _____

b. Acceptance Criteria defined (see SAP or Work Plan)

- Minimum Required Purge Volume (@ _____ well volumes) _____
- Maximum Allowable Turbidity _____ NTUs
- Stabilization of parameters _____ %

c. Field Testing Equipment used: Make _____ Model _____ Serial Number _____

Time (min)	Volume Removed (gal)	Temp. (°C)	pH (s.u.)	Spec. Cond. (µS/cm)	DO (mg/L)	ORP (mv)	Turbidity (NTU)	Flow Rate (ml/min)	Drawdown (m)	Color/Odor/etc.

d. Acceptance criteria pass/fail Yes No N/A (contin. on back)
Has required volume been removed ☐ ☐ ☐
Has required turbidity been reached ☐ ☐ ☐
Have parameters stabilized ☐ ☐ ☐
If no or N/A - Explain below.

3. SAMPLE COLLECTION: Method: _____

Sample ID	Container Type	No. of Containers	Preservation	Analysis Req.	Time

Comments _____

Signature _____ Date _____

Investigation Derived Waste Management

Procedure 3-05

1.0 Purpose and Scope

This standard operating procedure (SOP) describes activities and responsibilities of the United States (U.S.) Navy Environmental Restoration (ER) Program, Naval Facilities Engineering Command, Atlantic (NAVFAC Atlantic) with regard to management of investigation-derived waste (IDW). The purpose of this procedure is to provide guidance for the minimization, handling, labelling, temporary storage, inventory, classification, and disposal of IDW generated under the ER Program. This procedure will also apply to personal protective equipment (PPE), sampling equipment, decontamination fluids, non-IDW trash, non-indigenous IDW, and hazardous waste generated during implementation of removal or remedial actions. The information presented will be used to prepare and implement work plans (WPs) for IDW-related field activities. The results from implementation of WPs will then be used to develop and implement final IDW disposal plans.

If there are procedures whether it be from Resolution Consultants, state and/or federal that are not addressed in this SOP and are applicable to IDW then those procedures may be added as an appendix to the project specific SAP.

This procedure applies to all Navy ER projects performed in the NAVFAC Atlantic Area of Responsibility.

This procedure shall serve as management-approved professional guidance for the ER Program and is consistent with protocol in the Uniform Federal Policy-Quality Assurance Project Plan (DoD 2005). As professional guidance for specific activities, this procedure is not intended to obviate the need for professional judgment during unforeseen circumstances. Deviations from this procedure while planning or executing planned activities must be approved by both the Contract Task Order (CTO) Manager and the Quality Assurance (QA) Manager or Technical Director, and documented.

This procedure was developed to serve as management-approved professional guidance for the management of IDW generated under the ER Program. It focuses on the requirements for minimizing, segregating, handling, labeling, storing, and inventorying IDW in the field. Certain drum inventory requirements related to the screening, sampling, classification, and disposal of IDW are also noted in this procedure.

2.0 Safety

The health and safety considerations for the work associated with this SOP, including both potential physical and chemical hazards, will be addressed in the project Health and Safety Plan (HASP). In the absence of a HASP, work will be conducted according to the CTO WP and/or direction from the **Site Safety Officer (SSO)**.

All **Field Personnel** responsible for IDW management must adhere to the HASP and must wear the PPE specified in the site-specific HASP. Generally, this includes, at a minimum, steel-toed boots or steel-toed rubber boots, safety glasses, American National Standards Institute-standard hard hats, and hearing protection (if heavy equipment is in operation). If safe alternatives are not achievable, discontinue site activities immediately.

3.0 Terms and Definitions

None.

4.0 Training and Qualifications

- 4.1 The **CTO Manager** is responsible for ensuring that IDW management activities comply with this procedure. The **CTO Manager** is responsible for ensuring that all personnel involved in IDW management shall have the appropriate education, experience, and training to perform their assigned tasks.
- 4.2 The **Program Quality Manager** is responsible for ensuring overall compliance with this procedure.
- 4.3 The **Field Manager** is responsible for ensuring that all IDW is managed according to this procedure.
- 4.4 All **Field Personnel** are responsible for the implementation of this procedure.

5.0 Equipment and Supplies

The equipment and supplies required for implementation of this SOP include the following:

- Containers for waste (e.g., [U.S. Department of Transportation] DOT approved 55-gallon open and closed top drums) and material to cover waste to protect from weather (e.g., plastic covering);
- Hazardous /non-hazardous waste drum labels (weatherproof);
- Permanent marking pens;
- Inventory forms for project file;
- Plastic garbage bags, zip lock storage bags, roll of plastic sheeting; and
- Steel-toed boots, chemical resistant gloves, coveralls, safety glasses, and any other PPE required in the HASP.

6.0 Procedure

The following procedures are used to handle the IDW.

6.1 Drum Handling

- 6.1.1 IDW shall be containerized using DOT approved drums. The drums shall be made of steel or plastic, have a 55-gallon capacity, be completely painted or opaque, and have removable lids (i.e., United Nations Code 1A2 or 1H2). Typically 55-gallon drums are used, however small drums may be used depending on the amount of waste generated. New steel drums are preferred over recycled drums.
- 6.1.2 Recycled drums should not be used for hazardous waste, PCBs or other regulated shipments. For short-term storage of liquid IDW prior to discharge, double-walled bulk steel or plastic storage tanks may be used. For this scenario, consider the scheduling and cost-effectiveness of this type of bulk storage, treatment, and discharge system versus longer-term drum storage.
- 6.1.3 For long-term IDW storage at other project locations, the DOT approved drums with removable lids are recommended. Verify the integrity of the foam or rubber sealing ring located on the underside of some drum lids prior to sealing drums containing IDW liquids.
- 6.1.4 If the ring is only partially attached to the drum lid, or if a portion of the ring is missing, select another drum lid with a sealing ring that is in sound condition.
- 6.1.5 To prepare IDW drums for labeling, wipe clean the outer wall surfaces and drum lids of all material that might prevent legible and permanent labeling. If potentially contaminated material adheres to the outer surface of a drum, wipe that material from the drum, and segregate the paper towel or rag used to remove the material with visibly soiled PPE and

disposable sampling equipment. Label all IDW drums and place them on pallets prior to storage.

6.2 Labelling

- 6.2.1 Containers used to store IDW must be properly labelled. Two general conditions exist: 1) from previous studies or on-site data, waste characteristics are known to be either hazardous or nonhazardous; or 2) waste characteristics are unknown until additional data are obtained.
- 6.2.2 For situations where the waste characteristics are known, the waste containers should be packaged and labelled in accordance with state regulations and any federal regulations that may govern the labelling of waste.
- 6.2.3 The following information shall be placed on all non-hazardous waste labels:
- Description of waste (i.e., purge water, soil cuttings);
 - Contact information (i.e., contact name and telephone number);
 - Date when the waste was first accumulated.
- 6.2.4 The following information shall be placed on all hazardous waste labels:
- Description of waste (i.e., purge water, soil cuttings);
 - Generator information (i.e., name, address, contact telephone number);
 - EPA identification number (supplied by on-site client representative);
 - Date when the waste was first accumulated.
- 6.2.5 When the final characterization of a waste is unknown, a notification label should be placed on the drum with the words "waste characterization pending analysis" and the following information included on the label:
- Description of waste (i.e., purge water, soil cuttings);
 - Contact information (i.e., contact name and telephone number);
 - Date when the waste was first accumulated.
- 6.2.6 Once the waste has been characterized, the label should be changed as appropriate for a nonhazardous or hazardous waste.
- 6.2.7 Waste labels should be constructed of a weatherproof material and filled out with a permanent marker to prevent being washed off or becoming faded by sunlight. It is recommended that waste labels be placed on the side of the container, since the top is more subject to weathering. However, when multiple containers are accumulated together, it also may be helpful to include labels on the top of the containers to facilitate organization and disposal.
- 6.2.8 Each container of waste generated shall be recorded in the field notebook used by the person responsible for labelling the waste. After the waste is disposed of, either by transportation off-site or disposal on-site in an approved disposal area, an appropriate record shall be made in the same field notebook to document proper disposition of IDW.

6.3 **Types of Site Investigation Waste**

Several types of waste are generated during site investigations that may require special handling. These include solid, liquid, and used PPE, as discussed further below.

Solid Waste

Soil cuttings from boreholes will typically be placed in containers unless site specific requirements allow for soil cuttings to be placed back into the borehole after drilling is complete. Drilling mud generated during investigation activities shall be collected in containers. Covers should be included on the containers and must be secured at all times and only open during filling activities. The containers shall be labelled in accordance with this SOP. An inventory containing the source, volume, and description of material put in the containers shall be logged on prescribed forms and kept in the project file.

Non-hazardous solid waste can be disposed on-site in the designated site landfill or in a designated evaporation pond if it is liquefied. Hazardous wastes must be disposed off-site at an approved hazardous waste landfill.

Liquid Waste

Groundwater generated during monitoring well development, purging, and sampling can be collected in truck-mounted containers and/or other transportable containers (i.e., 55-gallon drums). Lids or bungs on drums must be secured at all times and only open during filling or pumping activities. The containers shall be labelled in accordance with this SOP. Non-hazardous liquid waste can be disposed of in one of the designated lined evaporation ponds on-site. Hazardous wastes must be handled separately and disposed off-site at an approved hazardous waste facility.

Personal Protective Equipment

PPE that is generated throughout investigation activities shall be placed in plastic garbage bags. If the solid or liquid waste that was being handled is characterized as hazardous waste, then the corresponding PPE should also be disposed as hazardous waste. If not, all PPE should be disposed as non-hazardous waste in the designated on-site landfill. Trash that is generated as part of field activities may be disposed of in the landfill as long as the trash was not exposed to hazardous media.

6.4 **Waste Accumulation On-Site**

- 6.4.1 Solid, liquid, or PPE waste generated during investigation activities that are classified as nonhazardous or "characterization pending analysis" should be disposed of as soon as possible. Until disposal, such containers should be inventoried, stored as securely as possible, and inspected regularly, as a general good practice.
- 6.4.2 Solid, liquid, or PPE waste generated during investigation activities that are classified as hazardous shall not be accumulated on-site longer than 90 days. All hazardous waste containers shall be stored in a secured storage area. The following requirements for the hazardous waste storage area must be implemented:
 - Proper hazardous waste signs shall be posted as required by any state or federal statutes that may govern the labelling of waste;
 - Secondary containment to contain spills;
 - Spill containment equipment must be available;
 - Fire extinguisher;
 - Adequate aisle space for unobstructed movement of personnel.

- 6.4.3 Weekly storage area inspections shall be performed and documented to ensure compliance with these requirements. Throughout the project, an inventory shall be maintained to itemize the type and quantity of the waste generated.

6.5 Waste Disposal

- 6.5.1 Solid, liquid, and PPE waste will be characterized for disposal through the use of client knowledge, laboratory analytical data created from soil or groundwater samples gathered during the field activities, and/or composite samples from individual containers.
- 6.5.2 All waste generated during field activities will be stored, transported, and disposed of according to applicable state, federal, and local regulations. All wastes classified as hazardous will be disposed of at a licensed treatment storage and disposal facility or managed in other approved manners.
- 6.5.3 In general, waste disposal should be carefully coordinated with the facility receiving the waste. Facilities receiving waste have specific requirements that vary even for non-hazardous waste, so characterization should be conducted to support both applicable regulations and facility requirements.

6.6 Regulatory Requirements

The following federal and state regulations shall be used as resources for determining waste characteristics and requirements for waste storage, transportation, and disposal:

- Code of Federal Regulations (CFR), Title 40, Part 261;
- CFR, Title 49, Parts 172, 173, 178, and 179.

6.7 Waste Transport

A state-certified hazardous waste hauler shall transport all wastes classified as hazardous. Typically, the facility receiving any waste can coordinate a hauler to transport the waste. Shipped hazardous waste shall be disposed of in accordance with all RCRA/USEPA requirements. All waste manifests or bills of lading will be signed either by the client or the client's designee.

7.0 Quality Control and Assurance

- 7.1 Management of IDW must incorporate quality control measures to ensure conformance to these and the project requirements.

8.0 Records, Data Analysis, Calculations

- 8.1 Maintain records as required by implanting the procedures in this SOP.
- 8.2 Deviations from this procedure or the sampling and analysis plan shall be documented in field records. Significant changes shall be approved by the **Program Quality Manager**.

9.0 Attachments or References

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Author	Reviewer	Revisions (Technical or Editorial)
Mark Kromis Program Chemist	Chris Barr Program Quality Manager	Rev 0 – Initial Issue (May 2012)